

Law Offices of
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MEMO ENDORSED

November 29, 2022

BY ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
500 Pearl Street, Room 1360
New York, NY 10007

Plaintiff Zayas' request for an initial, 30-day, extension of time (from December 10, 2022, to January 9, 2023) to file an application to reopen is granted. SO ORDERED.


Edgardo Ramos, U.S.D.J
Dated: November 29, 2022
New York, New York

**RE: *Zayas v. 233 Ninth Corp., et al*
21cv10170 (ER)(JLC)**

Dear Judge Ramos:

I represent the plaintiff in the above referenced action and respectfully request an extension of time to file an application to reopen. This is Plaintiff's first request for an extension of time to reopen.

On November 10, 2022, the court discontinued this action subject to reopening should settlement not be consummated within 30 days. On November 28, 2022, Defendants' attorney's office contacted me to advise that Defendants' attorney, Sanjay Chaubey, will be out of the country until December 12, 2022. As such, parties will be unable to consummate settlement before December 10, 2022. Accordingly, Plaintiff respectful request a 30-day extension of time to file an application to reopen.

Thank you.

Respectfully,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (via ECF)

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November 28, 2022

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Sanjay Chaubey, Esq.
Attorneys for Defendants